

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

BANCO POPULAR DE PUERTO RICO, INC.	*	
	*	
	*	CIVIL NO. 01-1142 (GAG)
Plaintiff,	*	
	*	
v.	*	
	*	
LATIN AMERICAN MUSIC CO., INC., et al.,	*	
	*	
	*	
Defendants.	*	
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LATIN AMERICAN MUSIC CO., INC., et al.,	*	
	*	
	*	CIVIL NO. 01-1461 (GAG)
Plaintiffs,	*	
	*	
v.	*	
	*	
BANCO POPULAR DE PUERTO RICO, INC., et al.,	*	
	*	
	*	
Defendants.	*	
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**UNIVERSAL MUSIC GROUP'S CONSENTED REQUEST FOR A THREE-DAY  
EXTENSION OF TIME TO FILE POST-TRIAL BRIEF**

**TO THE HONORABLE COURT:**

**COMES NOW**, Universal Music Group (“Universal”), through the undersigned counsel, and respectfully **STATES, AVERS, and PRAYS**:

1. Universal hereby informs this Honorable Court that the undersigned counsel has consulted with counsel for Latin American Music Company, Inc. (“LAMCO”) and Asociacion de Compositores y Editores de Musica Latinoamericana (“ACEMLA”) (“LAMCO/ACEMLA”), Mauricio Hernandez-Arroyo, Esq., and he has consented to the relief requested herein.

2. On October 16, 2009, this Honorable Court held a bench trial in the above-captioned case to determine the ownership of the song “Fichas Negras”, which is disputed between co-defendants Universal and LAMCO/ACEMLA. At the conclusion of the bench trial, this Honorable Court granted Universal’s request that it be allowed to submit a post-trial brief on certain issues of law in controversy in the case. The Court had originally provided for a one-week term for each party to submit its briefs, after the transcript was made available by the court reporter.

3. On October 22, 2009, this Honorable Court issued an order in which it set the deadlines for the submissions of the post-trial briefs for November 6, 2009 for Universal, and November 20, 2009 for LAMCO/ACEMLA. (Docket No. 432).

5. Universal respectfully requests this Honorable Court’s indulgence in extending the deadline for the submission of Universal’s post-trial brief by three (3) working days, until Wednesday, November 11, 2009. We do so mindful that the Court had *sua sponte* extended the original period for submission of the briefs, and only because unforeseen circumstances – exacerbated by undersigned counsel Negrón-Vargas’ recent diagnosis of inflammatory arthritis – will not permit us to file the brief within the period allotted by the Court.

6. In the interest of fairness, we of course would request that LAMCO/ACEMLA be granted a corresponding extension of time to file its brief, until Wednesday, November 25, 2009.

**WHEREFORE**, Universal respectfully requests that this Honorable Court take notice of the aforementioned, and that it **GRANT** the requested extension of time to file Universal’s post-trial brief, until **Wednesday, November 11, 2009**.

**RESPECTFULLY SUBMITTED.**

**I CERTIFY** that on this same date I filed the foregoing by uploading to the CM/ECF system, which will send automatic notices to the attorneys of record.

In San Juan, Puerto Rico, this 4<sup>th</sup> day of November, 2009.

**Attorneys for Universal Music Group**

S/ EDGARDO COLON ARRARAS

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**EDGARDO COLON ARRARAS**

USDC No. 129612

E-mail: [ecolon@gaclaw.com](mailto:ecolon@gaclaw.com)

S/ MARIANA NEGRÓN-VARGAS

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**MARIANA NEGRÓN-VARGAS**

USDC No. 215309

E-mail: [mnegron@gaclaw.com](mailto:mnegron@gaclaw.com)

**GOLDMAN ANTONETTI & CORDOVA, PSC**

P.O. Box 70364

San Juan, PR 00936-8364

Tel. (787) 759-8000

Fax (787) 767-9177